

# **Exhibit 3**

## Applied Minds, LLC v. Guild Hall of East Hampton, Inc., No. 1:24-cv-01465

Charles Moulins <CMoulins@fenwick.com>

Fri 6/14/2024 5:52 PM

To:michael.chuven@klrw.law <michael.chuven@klrw.law>

Cc:AMI-GH Litigation <AMI-GHLitigation@fenwick.com>

 1 attachments (81 KB)

RE: Applied Minds LLC v. Guild Hall Subpoena;

Michael—

Thank you for our calls to discuss the subpoena our client Applied Minds served on May 24, 2024 on MAASS. I write to confirm that Applied Minds will not further extend any deadlines for MAASS to comply with the subpoena.

As you know, the subpoena specified a compliance deadline of June 6, 2024. MAASS did not serve any substantive response or any objection to the subpoena by that date. MAASS therefore waived any objections; it also failed to timely move to quash the subpoena. Instead, MAASS's then-counsel in this matter, Orin Ketyer, agreed to substantial compliance with all subpoena requests by June 20 (see attached correspondence). This agreement by MAASS's authorized legal representative is binding and must be complied with.

Based on our discussions, I understand that MAASS now intends to move to quash the subpoena. Any motion to quash will be untimely, and MAASS will breach its agreement to substantially comply with the subpoena by June 20.

Applied Minds reserves all rights, including the right to move to compel full compliance with the subpoena.

Best,  
Charles

**Charles Moulins**

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